UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ELAINE AGHAEEPOUR, ASHLEY GLASGOW, JULIE HIGGINS, SHANE MOORE, MICHELE NORRIS, JESUS RIVERA, SCHILCO, INC. and RAY SHILBER,

14 CV 5449 (NAR)

Plaintiffs,

-V-

NOTICE OF MOTION TO DISMISS THE FIRST AMENDED COMPLAINT

NORTHERN LEASING SYSTEMS, INC., MBF LEASING, LLC, LEASE FINANCE GROUP, LLC, LOUIS CUCINOTTA, JENNIFER CENTENO a/k/a JENNIFER NUGENT, JAY COHEN, SARA KRIEGER, JOSEPH I. SUSSMAN, and JOSEPH I. SUSSMAN, P.C.,

Defendants.

PLEASE TAKE NOTICE, that upon the annexed Declaration of Robert D. Lillienstein, dated February 9, 2015, together with the exhibits annexed thereto, and upon the pleadings and prior proceedings had herein, Defendants will move this Court, on March 24, 2015, for an Order, pursuant to Fed.R. Civ. P. 8(a), 9(b), and 12(b)(6), dismissing the First Amended Complaint in its entirety. Also submitted in support of the motion is Defendants' Memorandum of Law In Support of Motion To Dismiss The First Amended Complaint.

Pursuant to the motion scheduling Order of this Court, any answering papers and memoranda of law shall be served no later than March 9, 2015.

MOSES & SINGER LLP Attorneys for Defendants

By: /s/
Robert D. Lillienstein, Esq.
Jordan Greenberger, Esq.
405 Lexington Avenue
New York, New York 10174
(212) 554-7800 (telephone)
(212) 554-7807 (facsimile)